

Perth Casino Royal Commission

Witness Statement of Anthony Robin Godfrey

15 September 2021

- 1 I am Anthony Robin Godfrey of c/- Crown Perth, Great Eastern Highway, Burswood 6100.
- 2 This statement is provided in response to the witness summons to give evidence dated 7 September 2021 and issued pursuant to section 9 of the *Royal Commissions Act 1968* (WA), which is directed to me by the Perth Casino Royal Commission.
- 3 In this witness statement, I set out matters of fact of which I have personal knowledge. I do not intend to take the Commission through the documents in the case. This witness statement sets out my personal knowledge and recollection. I have also had reference to documents for the purpose of setting out my training in paragraphs 23 to 24 and identifying reports referred to in paragraphs 25 and 26.

MY ROLES WITH THE CROWN GROUP AND ITS PREDECESSOR BURSWOOD

(Questions 1 to 7)

- 4 I was first employed at the Burswood International Resort Casino (the predecessor to Crown Perth) in 1986 as an Inspector. I worked my way up through various roles until I was appointed to my current role of Premium Compliance Manager.
- 5 My roles at the casino over time have been:
 - a) Inspector (between 1 February 1986 and 1 April 1986);
 - b) Assistant Pit Boss (between 1 April 1986 and 31 June 1987);
 - c) Pit Boss Grade 2 (between 1 July 1987 to 30 June 1988);
 - d) Pit Boss (between 1 July 1988 to 6 August 1995);
 - e) Assistant Gaming Shift Manager (between 7 August 1988 to 20 January 2002);
 - f) International Room (Gaming Shift) Manager (between 21 November 2001 to 20 April 2005);
 - g) VIP Development Manager WA (between 21 April 2005 to 22 June 2009);
 - h) Manager Premium Business WA (between 23 June 2009 to 9 October 2011);
 - i) VIP Manager Table Games Pearl Room (between 10 October 2011 to 18 November 2012);
 - j) VIP Premium Player Manager (between 19 November 2012 to 6 September 2015);

Witness Statement of Anthony Robin Godfrey

- k) VIP Compliance Manager (between 7 September 2015 to 27 October 2019); and
- l) Premium Compliance Manager (between 28 October 2019 to the present).

6 By way of background, I began employment with Burswood Resort Management Ltd in February 1986.

7 Between 1986 and 2002 I reported to the gaming shift manager at the Perth Casino.

8 Since that time and during the course of my employment, the persons that I have reported to in each role that I previously held are as follows, to the best of my recollection:

- a) Richard Curtis, General Manager Operations, between approximately 2004 to 2007;
- b) Cheryl Sproul, Head of Department, at some time prior to 2009;
- c) Ejaz Dean, Executive General Manager, between approximately 2004 to 2007;
- d) Neil de Lima, General Manager Premium Business VIP International & Interstate Business, Senior VP International & Interstate Business Operations, between approximately 2011 to 2017; and
- e) Richard Smith, General Manager VIP Gaming from around 2013/2014 up to 2019.

9 The only role in which I have had people report to me directly was in my role as VIP Manager - Tables Games Pearl Room. In that role, I had 4 people over time who reported to me, all of whom were hosts. A host is a public relations role within the Pearl Room. Their time was spent looking after local members, organising accommodation, restaurants and theatre shows. This involved face to face interaction with patrons on a constant basis and rectifying any issues that arose in the Pearl Room.

My current role

10 In my current role, I have since August 2019 reported to Cori Cairns (Executive General Manager – Table Games). I do not have anybody reporting directly to me in my current role.

KPIs and bonuses

11 In my current role, no key performance indicators have yet been set by which my performance in my role is assessed. I expect that KPIs will be reintroduced once things have settled down following the current circumstances regarding COVID.

12 In my current role, I believe that I am eligible to receive bonuses in addition to my base remuneration. However, I have not received any recent notifications that I am part of the bonus scheme. My understanding is that whether I receive a bonus and the size of that bonus depends upon the performance of Burswood Management Limited, as well as meeting my own KPIs.

Witness Statement of Anthony Robin Godfrey

QUALIFICATIONS, EXPERTISE AND TRAINING*(Questions 8 to 11)*

- 13 I obtained a Diploma in Business from an institution in Perth known as Modal, in around the middle to late 1990s.
- 14 I have experience in relation to casino operations generally, having worked in casinos in London between 1978 and 1986 and in Perth between 1986 to date.

AML/CTF risk management

- 15 I do not have any formal qualifications in respect of anti-money laundering (**AML**) and counter-terrorism financing (**CTF**) risk management.
- 16 I recall that many years ago, AUSTRAC came to the casino and gave a presentation on our reporting obligations to AUSTRAC, which I attended, but I cannot recall when that was.
- 17 I also gained knowledge about AML/CRF risk management issues through online training (which included refresher courses) and being advised by superiors on various matters.
- 18 In the last couple of years, I have expanded my knowledge of AML/CRF risk management issues through online and face to face training.

EGM and FATG risk management

- 19 I do not have any formal qualifications in respect of electronic gaming machines (**EGM**) and fully automated table games (**FATG**) risk management. I also have no real experience in EGM and FATG risk management as I work purely in table games (this does not include FATGs).

RSG

- 20 Although I do not have any formal qualifications in respect of RSG, I have experience in this area. Particularly in my previous role as VIP Manager of the Tables Games in the Pearl Room, and to a lesser extent in my other prior roles, I was very conscious regarding the safety, wellbeing and welfare of players. My role involved getting to know the customers and becoming aware of any issues the customers were having, through conversing with those customers. If any problems became apparent through those conversations, I would communicate with the RSG group. That continued until about 1.5 years ago when my role changed to involve more compliance and overseeing access and membership to the Pearl Room, rather than daily face to face contact with patrons / members.

ICB / junket operations risk management and vulnerability of criminal infiltration

- 21 I do not have any formal qualifications in ICB/ junket operations risk management and have never been involved in the ICB / junket operations.

Witness Statement of Anthony Robin Godfrey

- 22 I also do not have any formal qualifications or experience in the area of vulnerability of criminal infiltration.

Training and induction

- 23 I attended an orientation when I commenced employment at the Perth Casino back in 1986. I did not receive any training or induction at this time on the topics referred to in paragraphs 15 to 22 above.
- 24 During the course of my employment at the casino I have received training generally, including in the areas of health and safety, respecting other employees, responsible gaming for managers, cyber security awareness, AML/CTF risk awareness training table games, AML/CTF targeted training, AML/CTF risk awareness training, RSG refresher, AML training, anti-bribery and corruption training, customer service and mental health awareness training and casino awareness training.

REGULAR REPORTS*(Question 12)*

- 25 I received the following regular reports in the course of my employment:
- a) Daily Pearl Room Guest Register Exception Reports – These reports were provided to me from around 2014 until now and highlighted any issues with people entering the Pearl Room without being signed in correctly.
 - b) Daily compliance reports – These reports were prepared by hosts of the Pearl Room (who reported directly to me) from around 2013 until now and identified anything occurring in regards to the behaviour and welfare of patrons in the Pearl Room. This report assisted me in keeping on top of any issues arising within the Pearl Room.
 - c) Daily Reports on the Pearl Room, Gaming Machines and Table Games and Riverside Room – these were prepared by the hosts in the Pearl Room and Riverside Room and provided to me. They included information on win and loss figures, most significant players and any functions or events.
 - d) Member turnover reports – These reports have been provided to me for at least the last three or four years on a monthly basis. They identify those members who have not reached the annual turnover which was a requirement in order to maintain Pearl Club member status.
 - e) Daily operations report – these were previously provided to me. These reports related to meeting budget. They stopped being produced at some point, but I do not recall when.
- 26 I was involved in preparing or generating the following reports:

Witness Statement of Anthony Robin Godfrey

- a) The CURA Report – this was a monthly report which contained a compliance questionnaire which I was required to complete, and attach the daily compliance reports for the month referred to in the paragraph above. The report was generated for the Legal Compliance Committee. The purpose of this report was to ensure that each department followed the relevant compliance requirements on a monthly basis. The primary source of the report data was the information I provided in completing the questionnaire and the daily compliance reports referred to in the paragraph above.
- b) Daily and Monthly Guest Registration Reports – the purpose of these reports was to identify the members entering the Pearl Room with a guest. They were generated primarily for my information and to comply with internal audit. The report was generated from SYCO and the primary source of the report data was from SYCO.
- c) Daily and Monthly Exception Summary Reports - the purpose of these reports was to identify guests who entered the Pearl Room who were not properly registered. They were generated for myself and internal audit. The monthly exception report was generated by compiling the daily exception reports and the primary source of the report data was from SYCO.

AML / CTF

(Questions 13 to 14)

- 27 My understanding of the AML process or system employed to receive notifications or concerns from Perth Casino employees is an unusual activity report (**UAR**). For example, if an employee saw something unusual, then they would complete a UAR. I understand that the UAR is electronic and goes to the AML team.
- 28 I am not sure of whether there is a system which records the receipt of the UARs. That is more likely a matter which the AML team would know. It may be recorded in CURA (which I am aware is a monthly report on legal compliance issues) but I am not sure.
- 29 I am not aware of the AML process or system employed to disseminate UARs within, and external to, Perth Casino, other than that the UARs go to the AML team.
- 30 In my current role, I am not involved in the UAR process. As part of my role, I oversee member and guest entry into the Pearl Room and the process of becoming a Pearl Room member. In my previous positions, I was more in a public relations role and dealt with member relations rather than gaming.
- 31 I am aware that as soon as someone buys in with \$10,000 in cash or more, the Table Games Manager or the Assistant Table Games Manager will complete an entry in iTrak and that entry will automatically go to the AML team. I understand that iTrak is a reporting system which

Witness Statement of Anthony Robin Godfrey

contains information such as Notices of Revocation of Licence (**NRLs**), barring and incidents of inappropriate behaviour.

32 The impact of a notification of suspected money laundering relating to a patron on the continued gaming activities of that patron at the Perth Casino is not an area that I know about.

33 I am aware that use is made of surveillance of gaming operations at the Perth Casino for activities suggestive of money laundering. If a patron is observed by a staff member, that staff member can escalate it to their immediate supervisor, who will then take the appropriate action. The types of surveillance include CCTV, facial recognition and people on the floor of the casino.

INTERNATIONAL COMMISSION BUSINESS AND JUNKETS

(Questions 15 to 19)

Question 15

34 The only time I had anything to do with ICB was when I was on the gaming floor between 1986 and 1990. At that time I was "pit bossing" and I oversaw private gaming areas and staff. Since then, I have had no active involvement with ICB. By "pit bossing" I mean looking after the Inspectors, dealers / croupiers, making sure they are dealing the game correctly, sorting out issues on the tables and resolving those issues if they happen.

35 I do not have any knowledge about the financial model of the ICB in the Perth Casino.

36 I was not involved in assessing ICB patrons prior to the Perth Casino commencing business with those persons or with reviewing ICB patrons' continuing association with the Perth Casino.

37 I am aware that Neil de Lima was the senior manager responsible for ICB at the Perth Casino between around 2011 to 2017. His title was Senior VP of International Marketing and he looked after the local and international business. I reported to him.

Question 16

38 I was never involved in any of the matters set out in paragraph 16(a) to (f) of the List of Topics to be addressed by me in this statement. I was generally aware that international patrons visited Crown Perth and joined various gaming programs. In terms of target markets, I was aware that back in 1986 the target markets were Indonesia and Thailand. At some time, the target markets moved to Singapore and China, but I cannot recall when that occurred.

39 I recall that marketing for ICB and premium/privileged players included big events for international players, dinner functions, golf, and competitions, including baccarat competitions. Those marketing events have not continued.

Question 17

Witness Statement of Anthony Robin Godfrey

- 40 I am not aware of the extent to which RSG staff were or are involved in the assessment of junket operators and (or) junket representatives prior to the Crown Group commencing business with those persons.

Question 18

- 41 I am aware that inspectors who supervise gaming tables record every bet placed by the patron and record that information in ATOM. At the end of time spent at a table, it is possible to go to SYCO and look up and see the turnover and win/loss for a session.
- 42 I do not know whether measures were taken or procedures adopted to ascertain or confirm that junket and (or) premium/privileged players were not gambling beyond their means. I am also not aware of the extent to which RSG staff played an active role in monitoring the gambling activity of junket and (or) premium/privileged players.

Question 19

- 43 I had no involvement in the management of junket play and (or) premium/privileged patrons.

RESPONSIBLE SERVICE OF GAMING

(Questions 20 to 24)

Question 20

- 44 I am aware that staff at the Perth Casino go through online training as to RSG. There has also been face to face training on RSG in the last few months for all staff. While face to face RSG training has increased since last year, online training has always been provided.
- 45 The training includes providing an overview of what staff should look out for and provides situational videos which go through various scenarios on table games and EGMs. The RSG policies and procedures are available on the intranet, and are open to all staff. There is also information provided in training and on the intranet about staff responsibilities in respect of RSG. In particular, if a staff member sees a sign of concerning behaviour, then they should escalate that to their manager or to the RSG staff.
- 46 During the year, the RSG staff also put up information in the staff canteen to provide ongoing communication to staff about the importance of RSG.

Question 21

- 47 I am aware that iTrak is a recording system that is utilised by the RSG Department (amongst other departments) at the Perth Casino for the purposes of the provision of responsible gaming. I am also aware of the procedure in place, which is to communicate with the RSG Department if a patron is known to be experiencing issues with gambling.

Witness Statement of Anthony Robin Godfrey

48 The RSG Department is the main group that looks after patrons, but the responsibility lies with all staff. I am aware that Melanie Strelein Faulks is the general manager of the RSG Department.

49 As I am generally away from the public side of things in my role, if there are concerns raised by managers to me regarding players, I may make a call to Melanie to gather further information from Melanie, or Melanie might call me to provide information to her in relation to a patron. I also have a fortnightly meeting with Melanie and other managers to discuss players in the Pearl Room in respect of whom concerns have been raised.

Question 22

50 I am aware that the RSG Department is involved in some decisions affecting gambling operations at the Perth Casino, but I do not know the extent of their involvement. For example, I am aware that RSG Department is consulted about how a promotion is run, and the mechanics of the promotion, but I do not know everything that the RSG Department is involved in.

Question 23

51 I am aware of the process by which a patron may seek self-exclusion. A patron may contact an employee on the main gaming floor to ask a question about self-exclusion. That employee will then call the RSG Department and say they have a patron asking about self-exclusion. The RSG person will invite the patron to the RSG office and go through the process of filling out paperwork, putting comments on their patron accounts on SYCO and putting stop codes on their accounts. The patron will then automatically end up with a cross-property exclusion, that is both in Perth and Melbourne.

52 Alternatively, a patron may know where the RSG office is and go straight there and ask for self-exclusion.

53 I understand there is a process by which a third party may request that a patron be excluded. Occasionally, there are third party inquiries regarding patrons. This is more difficult because the third party might not want to be identified. If the third party does not want to be identified, the RSG Department will carry out investigations, and if considered appropriate, escalate it to the RSG Committee. Following the investigation, a decision whether or not to exclude the patron will be made.

Question 24

54 The RSG department is responsible for determining when patrons have been gambling at harmful levels.

55 I am aware that the Perth Casino can unilaterally exclude or bar patrons for extended periods on the basis of concerns that those patrons may have been gambling at harmful levels. In some cases, the Perth Casino may give the patrons a time-out. This means that they will need to stay

Witness Statement of Anthony Robin Godfrey

away from the Perth Casino for an agreed period of time. The agreement would be that they will not go into the gaming footprint, but they can still use the facilities at the resort. If the patron fails to follow that agreement over that time period, RSG will take further steps which could involve a more formal barring process. Whether the patron is given a time-out or barred straight away depends on the conversation between that patron and the RSG Department.

56 After the patron's time-out has ended, the patron will meet with RSG again if they wish to return to the Casino.

57 There is also the option of a patron self-excluding. This involves a more formal process where the patron completes an application for self-exclusion for a minimum of twelve months. When that period ends, the patron may seek to come back to the Perth Casino. This involves attending a revocation meeting with the RSG Department to assess their suitability.

LOYALTY PROGRAMS

(Questions 25 to 27)

Question 25

58 I am aware of the loyalty program operating at the Perth Casino known as Crown Rewards.

59 My understanding of the purpose of that program is that it is to reward patrons depending on their tier level. Patrons progress through tiers depending on their level of spend on gaming products and resort facilities, including accommodation and restaurants.

60 Patrons who are members of the Crown Rewards program contribute to the earnings and the profit of the Perth Casino, but to what extent I do not know.

Question 26

61 I do not know the extent to which Crown has taken into account RSG principles in designing, reviewing or amending the loyalty program operating at the Perth Casino, or the extent to which the RSG team has input into the ongoing operation of that program.

Question 27

62 I do not know what research or analysis has been conducted in respect of the loyalty program operating at the Perth Casino to ascertain whether, and if so to what extent, that program might cause or contribute to gambling related harm.

CORPORATE CULTURE / STAFFING

(Question 28)

63 To my knowledge, gained from my various roles over the years, including my present role as Premium Compliance Manager – Table Games, Perth Casino has a good corporate culture.

Witness Statement of Anthony Robin Godfrey

- 64 Whilst we have annual financial targets to meet, those targets are not in the forefront of my mind when carrying out my duties in the Pearl Room. Further, in my opinion, based on my observations of, and discussions with, staff working in my team, the financial targets are not in the forefront of other staff members' minds on a day to day basis. That is not to say that I put them out of my mind, but in my day to day duties, my aim is trying to maintain the relationships with the Pearl Room members, with a view to ensuring their time in the Pearl Room is a positive, fun experience. I want the Pearl Room to be a place they will want to come back to on a regular basis.
- 65 However, at all times, the Perth Casino culture is that staff members' safety and workplace environment is the most important consideration and priority. So, if any patron behaves in a way that is in any way inconsistent with that overriding consideration, it is dealt with as soon as it arises. If, for example, a patron acts inappropriately towards a staff member, the matter will be investigated as soon as we are informed by the staff member, and action will be taken. The staff member will be interviewed and offered counselling. The surveillance team will be asked to provide access to any surveillance footage. The patron will be interviewed, so that he or she is permitted to give his or her account of the incident. However, the staff member's account of the incident is always believed and accepted. The offending patron will then most likely be barred, not only from the Pearl Room, but from the resort complex. This will happen irrespective of the financial impact on the business in respect of revenue or profit generated from the offending patron.
- 66 The only other safety matter I can think of is the smoking exemption that is in place in the Pearl Room. This exemption means that members and their guests are entitled to smoke in the Pearl Room. This is a safety issue. However, no staff member can work in the Pearl Room unless they have volunteered to work there. In all such cases, staff members must first have a medical examination, which includes a lung capacity test and a blood pressure test. They are also asked to complete a health questionnaire. If their lung capacity is below the norm, they may be advised to seek further medical examination. Each staff member who works in the room is required to attend for a medical examination on an annual basis. State-of-the-art air extractors are installed in the Pearl Room, so as to exhaust cigarette smoke as efficiently as possible.
- 67 I believe Perth Casino provides staff with good working conditions, and that there is high staff satisfaction with the working conditions. They are provided with free parking, uniforms that are laundered every day, free food and beverage, and free specials in the staff canteen. There are also staff competitions.

(Question 29)

- 68 I can only answer in respect of incidents in the Pearl Room. I am not aware of staff concerns or complaints more generally. As described above, inappropriate treatment of staff members is

Witness Statement of Anthony Robin Godfrey

not tolerated. To the best of my knowledge, staff concerns and complaints regarding activities or incidents at the Perth Casino are properly investigated. To the best of my knowledge, there are no adverse consequences for staff members who raise concerns or make complaints. To the contrary, staff are encouraged to raise concerns or complaints about anything inappropriate that occurs in the workplace.

(Question 30)

Process employed by yourself and your team to protect the welfare of staff

69 I refer to my answer to question 28 above.

The adequacy of that process

70 In my view, the process at all times protects the welfare of the staff member.

The process or procedure for receiving misconduct complaints from Perth Casino employees

71 The majority of complaints and concerns are communicated verbally, which results in the matter being investigated and dealt with.

The person(s) and (or) position(s) responsible for undertaking investigation or review of received misconduct complaints

72 In respect of table games in the Pearl Room, the position responsible for undertaking investigation and review of received misconduct complaints is Director of Premium Gaming – Table Games. In respect of EGMs in the Pearl Room, the position responsible for undertaking investigation and review of received misconduct complaints is Director of Premium Gaming – EGMs.

POLICIES AND PROCEDURES – GENERAL

(Question 31)

73 I am not aware of the systems, policies, procedures, persons and persons responsible for or applicable to the Perth Casino for the matters set out in 31(a)(i) to (iii) of the List of Topics to be addressed by me in this statement.

74 In relation to the systems, policies and procedures applicable to the Perth Casino for due diligence upon and investigations in connection with gaming activities at Perth Casino of prospective local patrons offered access to the Pearl Room, there is a membership committee process which involves the surveillance team, the RSG team and, currently, the AML team.

75 I am the person responsible for overseeing the membership committee process for prospective local patrons to the Pearl Room.

76 I am not aware of the process for prospective interstate patrons offered access to the Pearl Room. I understand that the interstate programs (other than reciprocal arrangements) for

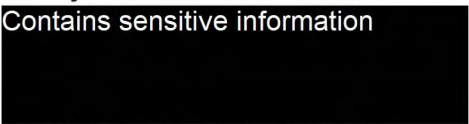
Witness Statement of Anthony Robin Godfrey

patrons to be offered access to the Pearl Room no longer exist. For reciprocal members, they are required to present their Mahogany Room membership card and show acceptable current ID. Pearl Room reception staff will check LUI and SYCO to ensure that the patron's details are correct and that no current stop codes are in place that would disallow entry into the Pearl Room.

- 77 I am aware that, previously, overseas patrons were only given access to the Pearl Room if they had joined the program set by the international operations team. I did not have any involvement in that process. There are no international programs at all now, so it is no longer possible for prospective patrons from overseas to be offered access to the Pearl Room.
- 78 I do not know the systems, policies and procedures applicable to the Perth Casino for reviewing, affirming, cancelling or terminating approvals or arrangements with junket operators and representatives, premium/privileged players and patrons in connection with gaming activities. International operations used to be responsible for this area, but the department does not exist anymore because international business finished a couple of years ago.
- 79 One of the systems offered to patrons is a cheque cashing facility. Local patrons can utilise this service by completing the relevant paperwork at the cage. The paperwork then goes to the credit committee. If approved, the patron can cash cheques up to the amount approved by the credit committee. If the patron wishes to cash cheques up to that approved amount in exchange for chips or a voucher, the patron must sign a counter cheque or a personal cheque. The Perth Casino will hold the counter cheque or personal cheque for a period of 5 days. Within the 5 days, the patron may redeem the personal cheque or counter cheque, otherwise the personal cheque or counter cheque will be banked by the Perth Casino. I believe that this is set out in section 20 of the Casino Manual (Operations).
- 80 The persons or positions responsible for extending the cheque cashing facility to patrons is the credit control committee and I believe that Maxine Kerimofski is the person responsible.
- 81 I do not know the systems, policies, procedures person(s) and position(s) applicable for reporting decisions to extend credit to patrons or for reporting operational information to the Gaming and Wagering Commission, or the manner by which such reporting is provided.

Witness Statement of Anthony Robin Godfrey

Contains sensitive information

A large black rectangular redaction box covers the signature area of the witness statement.

ANTHONY ROBIN GODFREY

Dated: 15 September 2021